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**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA**

MIKHAIL GERSHZON, KRISTIN DELLA,
and JILL LIENHARD, on behalf of
themselves, the general public, and those
similarly situated,

Plaintiffs,

v.

COLGATE-PALMOLIVE COMPANY,

Defendant.

Case No. 3:23-cv-04086-JCS

Hon. Joseph C. Spero

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING CLASS
CERTIFICATION DEADLINES**

1 Plaintiffs Mikhail Gershzon, Kristin Della, and Jill Lienhard (“Plaintiffs”) and Defendant
2 Colgate-Palmolive Company (“Defendant”) (collectively, “the Parties”), by and through their
3 respective counsel, hereby stipulate and agree as follows:

4 WHEREAS, the Parties have engaged in extensive discovery, including the production of
5 more than 50,000 documents and written discovery responses, and are continuing to cooperate in
6 good faith to complete the remaining discovery in an efficient and orderly manner;

7 WHEREAS, a central issue for class certification in this matter is the labeling of the
8 products at issue (the “Products”), including when certain representations were made on the
9 Products concerning recyclability;

10 WHEREAS, Colgate has previously produced certain product labels and served
11 interrogatory responses identifying those labels;

12 WHEREAS, Plaintiffs noticed Rule 30(b)(6) deposition topics and Defendant designated
13 three witnesses;

14 WHEREAS, Plaintiffs deposed the first Colgate witness on March 14, 2025;

15 WHEREAS, Defendant designated two additional Rule 30(b)(6) witnesses who will be
16 prepared to testify regarding the labeling and marketing topics;

17 WHEREAS, Plaintiffs have sought additional information related to the labeling of
18 specific Products bearing the challenged “Recyclable Tube” labeling, in order to adequately
19 prepare for upcoming depositions of witnesses with knowledge of the Product’s labeling and
20 marketing;

21 WHEREAS, Colgate has agreed to provide the additional information requested by
22 Plaintiffs in advance of the relevant depositions;

23 WHEREAS, one of the two remaining Rule 30(b)(6) witnesses is unavailable for
24 deposition prior to May 1, 2025, due to unavoidable work travel and family commitments, and
25 the Parties agree that proceeding with the deposition on that date will not prejudice either side
26 and will promote efficiency;

27 WHEREAS, in light of the pending production of additional Product label information
28 and the scheduling conflict for Colgate’s witness, the Parties agree to a five-week extension of

case deadlines to allow Colgate to complete its production of information, to allow for completion of the 30(b)(6) depositions, and to permit Plaintiffs to file their motion for class certification;

WHEREAS, the requested continuance of these depositions is narrowly tailored, supported by good cause, and will facilitate the completion of discovery in a manner that is fair to all Parties and consistent with the orderly progression of the case;

WHEREAS, there have been two prior requests to extend the case deadlines that were necessitated by technical issues and because of the volume of discovery in this matter;

WHEREAS, the extension will have no other effect on any case deadlines other than as specified below;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the case deadlines will be modified as follows:

Event	Deadline	New Deadline
Deadline for Plaintiffs to file the motion for class certification and any expert report(s) in support thereof	April 10, 2025	May 15, 2025
Deadline for Defendant to oppose the motion for class certification and produce any expert report(s) in support of its opposition	June 10, 2025	July 17, 2025
Mediation Deadline	July 15, 2025	August 19, 2025
Deadline for Plaintiffs to file the reply in support of motion for class certification	August 5, 2025	September 9, 2025
Deadline for Defendant to file any replies in support of its Daubert motion(s) and any opposition(s) to Plaintiffs' Daubert motion(s)	September 2, 2025	October 7, 2025
Deadline for Plaintiffs to file any replies in support of its Daubert motion(s)	September 30, 2025	November 4, 2025
Hearing on Plaintiffs' motion for class certification and any Daubert motion(s)	November 19, 2025 at 9:30 a.m.	December 17, 2025 at 9:30 a.m.

IT IS SO STIPULATED.

1 Dated: March 22, 2025

2 **GUTRIDE SAFIER LLP**

3 /s/Rajiv V. Thairani/

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ATTESTATION

12 In accordance with Civil Local Rule 5-1(h)(3), I attest that concurrence in the filing of this
13 document has been obtained from the other signatory.

14 DATED: March 22, 2025

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16 By: /s/Rajiv V. Thairani/

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21 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23 Dated: March 24, 2025

22
24 

25 The Honorable Joseph C. Spero
26 United States Magistrate Judge
27
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